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Police Department, Jacob Adams and Miguel Jahuey

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Fernando Garcia,

Plaintiff,

vs.

Corner Investment Company, LLC d/b/a The
Cromwell Las Vegas, Jacob Adams, Miguel
Jahuey, the Las Vegas Metropolitan Police
Department, a municipality, and Does I-XX,

Defendants.

Case Number:

2:22-cv-01960-MMD-VCF

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE**

(FIRST REQUEST)

The Parties, Plaintiff Fernando Garcia (“Plaintiff”), by and through their attorneys of record, Robert A. Nersesian, Esq. and Thea Marie Sankiewicz, Esq., with the law firm of Nersesian & Sankiewicz and Defendants, Las Vegas Metropolitan Police Department (“LVMPD”), Officer Jacob Adams (“Adams”) and Officer Miguel Jahuey (“Jahuey”) (collectively “LVMPD Defendants”), by and through their attorneys of record, Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., with the law firm of Marquis Aurbach, and hereby agree and jointly stipulate the following:

1. This request for an extension of time to file dispositive motions is not sought for an improper purpose or other purpose of delay. The parties are requesting a 14-day extension of the dispositive motion deadline. Additionally, counsel for LVMPD Defendants has had several depositions in the Kelly Patterson v. Las Vegas Metropolitan Police Department, et al, United States District Court, District of Nevada, Case No. 2:23-cv-00539-

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1 RFB-DJA and B.H., et al. v. CCSD, et al., United States District Court, District of Nevada,
2 Case No. 2:23-cv-00564-JCM-DJA, throughout the month of November. This is the first
3 request for extension of time in this matter. The parties respectfully submit that the reasons
4 set forth above constitute compelling reasons for the modest extension.

5 2. The Parties further agree, the dispositive motion deadline currently set for
6 November 13, 2023 shall be extended to Monday, November 27, 2023.

7 3. WHEREFORE, the parties respectfully request that the Dispositive Motion
8 be extended to and including Monday, November 27, 2023.

9 4. This Stipulation is being entered in good faith and not for purposes of delay.

10 IT IS SO STIPULATED.

11 Dated this 13th day of November, 2023.

Dated this 13th day of November, 2023.

12 NERSESIAN & SANKIEWICZ

MARQUIS AURBACH

13 By: /s/ Robert A. Nersesian
14 Robert A. Nersesian, Esq.
15 Nevada Bar No. 2762
16 Thea Marie Sankiewicz, Esq.
17 Nevada Bar No. 2788
18 528 S. Eighth Street
19 Las Vegas, Nevada 89101
20 Attorneys for Plaintiff Fernando Garcia

By: /s/ Jackie V. Nichols
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Attorneys for Defendants Las Vegas
Metropolitan Police Department, Jacob
Adams and Miguel Jahuey

21 **ORDER**

22 The above Stipulation is hereby GRANTED.

23 IT IS SO ORDERED.



24 United States ~~District Court~~ Magistrate Judge

25 DATED: 11-13-2023

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND DISPOSITIVE MOTION DEADLINE (FIRST REQUEST)** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 13th day of November, 2023.

☒ I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

☐ I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

N/A

/s/ Krista Busch
An employee of Marquis Aurbach

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